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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION

4
5 ADMIIN, INC. d/b/a PARO, INC.,)
6 a Delaware corporation,)
7)
8 Plaintiff,)
9)
10 vs.) No. 1:23-cv-04430
11)
12 LUKE KOHAN, an individual, and)
13 FIRMKEY SOLUTIONS, LLC,)
14)
15 Defendants.)

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Videotaped 30(b)(6) deposition of PARO, INC.,
by and through its representative MICHAEL CHEN, taken
before NADINE J. WATTS, CSR, RPR, and Notary Public,
pursuant to the Federal Rules of Civil Procedure for the
United States District Courts pertaining to the taking
of depositions, at Suite 4700, 71 South Wacker Drive, in
the City of Chicago, Cook County, Illinois, commencing
at 11:06 a.m. on the 20th day of September, A.D., 2023.

1 seeing a LinkedIn post where -- by which Luke Kohan
2 announced the launch of FirmKey. It makes mention of,
3 you know, being open for business I think is what
4 essentially the gist of the message was.

5 Q Does that LinkedIn post have anything to do with
6 misappropriation?

7 MS. WOGHIREN: I'm going to object to the extent
8 misappropriation is a legal term. You can answer to the
9 extent you understand.

10 THE WITNESS: I'm not sure, but I think it gives
11 Paro concern as to what the intentions are and, you
12 know, the announcement and the existence of FirmKey.

13 MR. PASTERNAK: Can you scroll up? A little more.
14 A little more. Stop.

15 What irreparable harm has Paro suffered due to
16 the alleged misappropriation?

17 MS. WOGHIREN: I'm just going to object. It calls
18 for irreparable harm, which is a legal conclusion. But
19 you can answer.

20 THE WITNESS: I think in a similar vein as my
21 previous answer, there's quite a concern about the harm
22 or damage that FirmKey and its existence and what that
23 might mean for Paro's business, what that could do as
24 far as, you know, potentially hiring or poaching Paro

1 clients or experts to come work for FirmKey and no
2 longer work at Paro -- or no longer work for Paro.

3 Sorry.

4 MR. PASTERNAK: Q Has it suffered any irreparable
5 harm yet?

6 A At this time, not that I'm aware of.

7 Q Did Mr. Kohan solicit any Paro customers?

8 A A clarifying question. You're referring to
9 its --

10 Q I should have said --

11 A -- clients or experts?

12 Q Its clients.

13 A Yeah.

14 Q Its clients.

15 A Clients.

16 Q I should have said clients.

17 A As of this hearing, I'm not aware of a
18 solicitation of Paro clients. I believe that discovery
19 is still ongoing. But at this time I'm not aware of any
20 solicit -- direct solicitation of Paro clients.

21 Q Are you aware --

22 MR. MOELLER: You mean other than what he's already
23 testified to, right, Tom?

24 MR. PASTERNAK: No. I'm asking if he can testify

1 about any solicitation.

2 MR. MOELLER: I think he's already answered that
3 question.

4 MR. PASTERNAK: I haven't -- Well, that's okay. I
5 haven't asked him that question.

6 THE WITNESS: I stand by my answer there.

7 MR. PASTERNAK: Q Have there been any -- then have
8 there been any damages due to solicitation?

9 A At this time, not that I'm aware of.

10 Q Do you know who Andrew Bonaventura is?

11 A I do know who Andrew Bonaventura is, yes.

12 Q Who is that?

13 A Andrew Bonaventura is -- or Drew, is a former
14 employee of Paro.

15 Q And did you send him a cease and desist letter
16 for something?

17 MS. WOGHIREN: I'm going to object to the question
18 asking you. Are you talking about Paro or --

19 MR. PASTERNAK: Paro.

20 MS. WOGHIREN: -- Mr. Chen?

21 THE WITNESS: Paro, with support from our legal
22 counsel, did send Makosi and also -- and I believe also
23 Drew himself a cease and desist letter for violation of
24 a non-compete and confidentiality agreement.

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1 STATE OF ILLINOIS)

) SS:

2 COUNTY OF C O O K)

3 The within and foregoing deposition of the
4 aforementioned witness was taken before NADINE J. WATTS,
5 CSR, RPR and Notary Public, at the place, date and time
6 aforementioned.

7 There were present during the taking of the
8 deposition the previously named counsel.

9 The said witness was first duly sworn and was
10 then examined upon oral interrogatories; the questions
11 and answers were taken down in shorthand by the
12 undersigned, acting as stenographer and Notary Public;
13 and the within and foregoing is a true, accurate and
14 complete record of all of the questions asked of and
15 answers made by the forementioned witness, at the time
16 and place hereinabove referred to.

17 The signature of the witness was not waived,
18 and the deposition was submitted, pursuant to Rules
19 30(e) of the Rules of Civil Procedure for the United
20 States District Courts, to the deponent per copy of the
21 attached letter.

22 The undersigned is not interested in the
23 within case, nor of kin or counsel to any of the
24 parties.

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1 Witness my official signature and seal as
2 Notary Public in and for Cook County, Illinois on this
3 22nd day of September, A.D. 2023.

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6 NADINE J. WATTS, CSR, RPR
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8 License No. 084-002736
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10 Notary Public
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12 One North Franklin Street
13

14 Suite 3000
15

16 Chicago, Illinois 60606
17

18 Phone: (312) 442-9087
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